

Marc A. Lieberman, Esq. (SBN 157318)

marc.lieberman@flpllp.com

Alan W. Forsley, Esq. (SBN 180958)

alan.forsley@flpllp.com

FLP LAW GROUP LLP

1875 Century Park East, Suite 2230

Los Angeles, California 90067

Telephone: (310) 284-7350

Facsimile: (310) 432-5999

Attorneys for the Ruigomezes

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES DIVISION

In re

GIRARDI KEESE,

Debtor.

Case No. 2:20-bk-21022-BR

**THE RUIGOMEZ CREDITORS
RESPONSE TO THE TRUSTEE'S
MOTION FOR ORDER APPROVING
COMPROMISE WITH VIRAGE SPV I
LLC, (CLAIM 77-1) PURSUANT TO
FEDERAL RULE OF BANKRUPTCY
PROCEDURE 9019**

Date: June 6, 2023

Time: 10:00 a.m.

Ctrm: 1668, 255 E. Temple St., L.A., CA

Creditors Joseph Ruigomez, Kathleen Ruigomez, and Jamie Ruigomez (collectively the "**Ruigomezes**") file this Response to Chapter 7 Trustee Ellisa Miller's ("**Trustee**") Motion for Order Approving Compromise with Virage SPV I LLC ("**Virage**"), (CLAIM 77-1), Pursuant to Federal Rule of Bankruptcy Procedure 9019 (the "**Motion**").

The Motion seeks to resolve Virage's Claim 77-1 and the Ruigomezes' claims

1 against Virage in the adversary matter of *Ruigomez et al., v. Miller et al.* Case No. 2:22-ap-
2 01168-BR (“**Adversary Complaint**”). For the reasons stated in the Motion, the
3 Ruigomezes believe the Trustee’s settlement with Virage, as to Claim 77-1 and the
4 Ruigomezes claims against Virage in the Adversary Complaint, is in the best interests of
5 the bankruptcy estate and thus the Ruigomezes support approval of the Motion.
6
7

8 DATED: May 18, 2023

FREDMAN LIEBERMAN PEARL LLP

9
10 By: 

Marc A. Lieberman, Esq.

Alan W. Forsley, Esq.

Attorneys for creditors the Ruigomezes
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
FLP Law Group LLP 1875 Century Park East, Suite 2230, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **THE RUIGOMEZ CREDITORS RESPONSE TO THE TRUSTEE'S MOTION FOR ORDER APPROVING COMPROMISE WITH VIRAGE SPV I LLC, (CLAIM 77-1) PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **May 18, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

II. SERVED BY UNITED STATES MAIL:

On (*date*) **May 18, 2023**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Honorable Judge Barry Russell
United States Bankruptcy Court
255 E. Temple Street, Suite 1660
Los Angeles, CA 90012

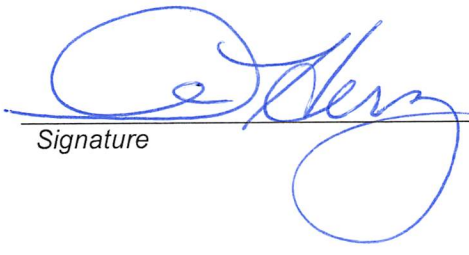
☐ Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*), I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 18, 2023 ADELAIDA HERNANDEZ
Date *Printed Name*


Signature

Service List

Via NEF:

- **Kyra E Andrassy** kandrassy@swelawfirm.com, lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- **Rafey Balabanian** rbalabanian@edelson.com, docket@edelson.com;5926930420@filings.docketbird.com
- **Michelle Balady** mb@bedfordlg.com, leo@bedfordlg.com
- **Robert D Bass** bob.bass47@icloud.com
- **Reem J Bello** rbello@goeforlaw.com, kmurphy@goeforlaw.com
- **Kate Benveniste** kate.benveniste@us.dlapiper.com, dlaphx@us.dlapiper.com
- **Ori S Blumenfeld** oblumenfeld@laklawyers.com, nlessard@laklawyers.com;smcfadden@laklawyers.com
- **Evan C Borges** eborges@ggtriallaw.com, cwinsten@ggtriallaw.com
- **William E Brueckner** wbrueckner@woodsoviatt.com
- **Richard Dennis Buckley** rbuckley@safarianchoi.com
- **Steve Burnell** Steve.Burnell@gmlaw.com, sburnell@ecf.courtdrive.com;sburnell@ecf.inforuptcy.com;cheryl.caldwell@gmlaw.com;denise.walker@gmlaw.com
- **Glenn Ward Calsada** glenn@calsadalaw.com, lnw@calsadalaw.com;glennalsada@gmail.com,niko@calsadalaw.com,lauren@calsadalaw.com,pat@calsadalaw.com
- **Indira J. Cameron-Banks** indira@cameronjones.law, tiffany@cameronbanksllaw.com
- **Michael F Chekian** mike@cheklaw.com, chekianmr84018@notify.bestcase.com
- **Fang Chen** fang@fangchenlaw.com
- **Marie E Christiansen** mchristiansen@vedderprice.com, ecfladocket@vedderprice.com,marie-christiansen-4166@ecf.pacerpro.com
- **Baruch C Cohen** bcc@BaruchCohenEsq.com, paralegal@baruchcohenesq.com
- **Leslie A Cohen** leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com;clare@lesliecohenlaw.com
- **Jennifer Witherell Crastz** jcrastz@hrhlaw.com
- **Ashleigh A Danker** adanker731@gmail.com
- **Richard T Egger** richard.egger@bbklaw.com, linda.tapia@bbklaw.com
- **Lei Lei Wang Ekvall - DECEASED -** lekvall@swelawfirm.com, lgarrett@swelawfirm.com;gcruz@swelawfirm.com;jchung@swelawfirm.com
- **Richard W Esterkin** richard.esterkin@morganlewis.com
- **Oscar Estrada** oestrada@ttc.lacounty.gov
- **Timothy W Evanston** tevanston@swelawfirm.com, gcruz@swelawfirm.com;lgarrett@swelawfirm.com;jchung@swelawfirm.com
- **Jeremy Faith** Jeremy@MarguliesFaithlaw.com, Helen@MarguliesFaithlaw.com;Angela@MarguliesFaithlaw.com;Vicky@MarguliesFaithlaw.com
- **James R Felton** jfelton@gblawllp.com, pstruntz@gblawllp.com;msingleman@gblawllp.com
- **Robert W Finnerty** rfinnerty@actslaw.com
- **James J Finsten** , jimfinsten@hotmail.com
- **James J Finsten** jfinsten@lurie-zepeda.com, jimfinsten@hotmail.com
- **Alan W Forsley** alan.forsley@flpllp.com, awf@fklawfirm.com,awf@fl-lawyers.net,addy.flores@flpllp.com
- **Michael E Friedman** MichaelFriedmanLaw@gmail.com
- **Steven R. Friedman** stevenrfriedman@gmail.com
- **Larry W Gabriel** lgabrielaw@outlook.com, tinadow17@gmail.com
- **James B Glucksman** jbg@dhclegal.com
- **Robert P Goe** kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com
- **Eric D Goldberg** eric.goldberg@dlapiper.com, eric-goldberg-1103@ecf.pacerpro.com
- **Rosendo Gonzalez** rossgonzalez@gonzalezplc.com, rgonzalez@ecf.axosfs.com;jzavala@gonzalezplc.com;zig@gonzalezplc.com;gig@gonzalezplc.com
- **Andrew Goodman** agoodman@andyglaw.com, Goodman.AndrewR102467@notify.bestcase.com

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

- **Suzanne C Grandt** suzanne.grandt@calbar.ca.gov, joan.randolph@calbar.ca.gov
- **Steven T Gubner** sgubner@bg.law, ecf@bg.law
- **Asa S Hami** asa.hami@gmlaw.com, ahami@ecf.courtdrive.com; patricia.dillamar@gmlaw.com; pdillamar@ecf.courtdrive.com
- **Brian T Harvey** bharvey@buchalter.com, IFS_filing@buchalter.com; dbodkin@buchalter.com
- **Stella A Havkin** stella@havkinandshrago.com, shavkinesq@gmail.com
- **James Andrew Hinds** jhinds@hindslawgroup.com; mduran@hindslawgroup.com, mduran@hindslawgroup.com
- **Marshall J Hogan** mhogan@swlaw.com, knestuk@swlaw.com
- **Bradford G Hughes** bhughes@clarkhill.com, mdelosreyes@clarkhill.com; kwebster@clarkhill.com
- **Sheryl K Ith** sith@cookseylaw.com
- **Razmig Izakelian** razmigizakelian@quinnemanuel.com
- **Steven D Jerome** sjerome@swlaw.com
- **Lillian Jordan** nefrecipients@donlinrecano.com, RMAPA@DONLINRECANO.COM
- **Alphamorlai Lamine Kebeh** akebeh@danninggill.com
- **Molly J. Kjartanson** mkjartanson@swlaw.com
- **Michael S Kogan** mkogan@koganlawfirm.com
- **Kenneth A Kotarski** KKOTARSKI@HAMRICKLAW.COM, hmartindale@HAMRICKLAW.COM; pliscano@hamricklaw.com; gknopfler@hamricklaw.com; khearn@hamricklaw.com; secretary2@hamricklaw.com; sjjustice@hamricklaw.com; jpoole@hamricklaw.com
- **Lewis R Landau** Lew@Landaunet.com
- **Janet A Lawson** jlawsonlawyer@gmail.com, G38570@notify.cincompass.com
- **Daniel A Lev** daniel.lev@gmlaw.com, cheryl.caldwell@gmlaw.com; dlev@ecf.courtdrive.com
- **Marc A Lieberman** marc.lieberman@flpllp.com, safe.saleem@flpllp.com, addy@flpllp.com
- **Elizabeth A Lombard** elombard@zwickerpc.com, bknotices@zwickerpc.com
- **Noreen A Madoyan** Noreen.Madoyan@usdoj.gov
- **Aaron J Malo** amalo@sheppardmullin.com, clopez@sheppardmullin.com; abilly@sheppardmullin.com
- **Kathleen P March** kmarch@bkylawfirm.com, kmarch3@sbcglobal.net, kmarch@sbcglobal.net
- **Craig G Margulies** Craig@MarguliesFaithlaw.com, Vicky@MarguliesFaithlaw.com; Helen@MarguliesFaithlaw.com; Angela@MarguliesFaithlaw.com
- **Ron Maroko** ron.maroko@usdoj.gov
- **Damian J. Martinez** damian.martinez@aalrr.com, julissa.ruiz@aalrr.com
- **Peter J Mastan** peter.mastan@dinsmore.com, SDCMLFiles@dinsmore.com; Katrice.ortiz@dinsmore.com
- **Edith R. Matthai** ematthai@romalaw.com, lrobie@romalaw.com
- **Daniel J McCarthy** dmccarthy@hillfarrer.com, spadilla@hillfarrer.com; nchacon@hfbllp.com
- **Dennis E McGoldrick** dmccgoldricklaw@yahoo.com, demcg@demcg.com
- **Elissa Miller (TR)** CA71@ecfcbis.com, MillerTrustee@gmlaw.com; C124@ecfcbis.com; cheryl.caldwell@gmlaw.com; cheryl.caldwell@ecf.courtdrive.com
- **Eric A Mitnick** MitnickLaw@gmail.com, mitnicklaw@gmail.com
- **Byron Z Moldo** bmoldo@ecjlaw.com, amatsuoka@ecjlaw.com, dperez@ecjlaw.com
- **Kevin H Morse** kmorse@clarkhill.com, blambert@clarkhill.com
- **Glenn D. Moses** gmoses@venable.com, cascavone@venable.com; ipmalcolm@venable.com; jadelgado@venable.com
- **Gilbert M Nishimura** gnishimura@snw-law.com, schin@snw-law.com; sgalingo@snw-law.com; ffilimona@snw-law.com
- **Scott Olson** scott.olson@bclplaw.com, scott-olson-2161@ecf.pacerpro.com, ecfsfdocket@vedderprice.com, nortega@vedderprice.com
- **Aram Ordubegian** ordubegian.aram@arentfox.com
- **Carmela Pagay** ctp@lnbyb.com
- **Carmela Pagay** ctp@lnbyg.com
- **Leonard Pena** lpena@penalaw.com, penasomaecf@gmail.com; penalr72746@notify.bestcase.com
- **Matthew D Pham** mpham@allenmatkins.com, mdiaz@allenmatkins.com
- **Steven G. Polard** steven.polard@ropers.com, calendar-lao@ropers.com; keiko.kakiuchi@ropers.com; tiffany.sterling@ropers.com; anthony.arriola@ropers.com

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

- **Christopher E Prince** cprince@lesnickprince.com, jmack@lesnickprince.com; cprince@ecf.courtdrive.com; jnavarro@lesnickprince.com
- **Amy Quartarolo** amy.quartarolo@lw.com, laura.pumerville@lw.com; amy-quartarolo-2972@ecf.pacerpro.com
- **Michael J Quinn** mquinn@vedderprice.com, ecfladocket@vedderprice.com, michael-quinn-2870@ecf.pacerpro.com, ahirschowitz@vedderprice.com
- **Dean G Rallis** drallis@hahnlawyers.com, jevans@hahnlawyers.com; drallis@ecf.courtdrive.com; jevans@ecf.courtdrive.com
- **Ronald N Richards** ron@ronaldrichards.com, 7206828420@filings.docketbird.com
- **Karen Rinehart** krinehart@omm.com, karen-rinehart-3320@ecf.pacerpro.com
- **Kevin C Ronk** Kevin@portillorok.com, Attorneys@portillorok.com
- **Brian M Rothschild** brothschild@parsonsbehle.com, usclawyer@yahoo.com; ecf@parsonsbehle.com
- **Frank X Ruggier** frank@ruggierlaw.com, enotice@pricelawgroup.com
- **William F Savino** wsavino@woodsoviatt.com, lherald@woodsoviatt.com
- **Scott A Schiff** sas@soukup-schiff.com
- **Daren M Schlechter** daren@schlechterlaw.com, assistant@schlechterlaw.com
- **Kenneth John Shaffer** johnshaffer@quinnemanuel.com
- **Amir Shakoorian** AShakoorian@GGTrialLaw.com
- **Summer M Shaw** ss@shaw.law, shawsr70161@notify.bestcase.com; shawsr91811@notify.bestcase.com
- **Zev Shechtman** zs@DanningGill.com, danninggill@gmail.com; zshechtman@ecf.inforuptcy.com
- **Anastasija Olegovna Snicarenko** legal@flyxo.com, jennifer@cypressllp.com
- **Richard M Steingard** , awong@steingardlaw.com
- **Andrew Still** astill@swlaw.com, kcollins@swlaw.com
- **Annie Y Stoops** annie.stoops@afslaw.com, yvonne.li@arentfox.com
- **Philip E Strok** pstrok@swelawfirm.com, gcruz@swelawfirm.com; 1garrett@swelawfirm.com; jchung@swelawfirm.com
- **Jeffrey L Sumpter** jsumpter1@cox.net
- **Terrence Swinson** terrenceswinson@gmail.com
- **Tamar Terzian** tamar@terzlaw.com, sandra@terzlaw.com
- **Boris Treyzon** btreyzon@actslaw.com, pjs@actslaw.com
- **United States Trustee (LA)** ustpreion16.la.ecf@usdoj.gov
- **Diane C Weil** dcweil@dcweillaw.com, diane.c.weil@Gmail.com, dweil@ecf.inforuptcy.com, jfiser@dcweillaw.com
- **David R. Weinstein** dweinstein@weinsteinlawfirm.net
- **Andrew D. Weiss** ADWeiss@oclawadw.com
- **Sharon Z. Weiss** sharon.weiss@bclplaw.com, raul.morales@bclplaw.com, REC_KM_ECF_SMO@bclplaw.com
- **Jessica Wellington** jwellington@bg.law, ecf@bg.law
- **Pauline White** pauline@paulinewhite.com
- **Eric D Winston** ericwinston@quinnemanuel.com
- **Christopher K.S. Wong** christopher.wong@afslaw.com, yvonne.li@arentfox.com
- **Robert M Yaspan** court@yaspanlaw.com, tmenachian@yaspanlaw.com
- **Timothy J Yoo** tjy@lnbyb.com
- **Isaac R Zfaty** izfaty@muchlaw.com
- **David B Zolkin** dzolkin@wztslaw.com, maraki@wztslaw.com, sfritz@wztslaw.com
- **Joshua del Castillo** jdelcastillo@allenmatkins.com, mdiaz@allenmatkins.com